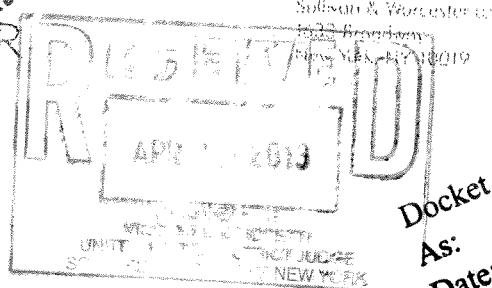




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T 212 660 3600
F 212 660 3061
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April 12, 2013

By Facsimile: (914) 390-4170

The Honorable Vincent L. Briccetti
United States District Court
Southern District of New York
300 Quarropas Street, Room 630
White Plains, New York 10601

Docket in case #
As:
Date:

APPLICATION GRANTED

SO ORDERED *VLS*

VINCENT L. BRICCETTI
U.S.D.J.

4/15/13

Re: *Miller v. Wells Fargo Bank, N.A. et al.* No. 13 Civ. 1541 (VB)

Dear Judge Briccetti:

This firm represents defendants Assurant, Inc. ("Assurant") and American Security Insurance Company ("American Security") in connection with the Class Action Complaint ("Complaint") filed in the above-captioned action. Pursuant to Section 2.C.i of Your Honor's Individual Practices, we write to request permission to file a memorandum of law not to exceed thirty-five (35) pages in support of Assurant and American Security's forthcoming joint motion to dismiss the Complaint pursuant to Fed. R. Civ. P. 9(b), 12(b)(1), and 12(b)(6).

Good cause exists for the page limit extension. The Complaint asserts six counts against Assurant and American Security: unjust enrichment (Count II); multiple violations of the federal Racketeer Influenced and Corrupt Organizations Act, 18 U.S.C. § 1961 *et seq.* (Counts III and IV); aiding and abetting a breach of fiduciary duty (Count VI); multiple violations of New York General Business Law § 349 (Count VII); and declaratory and injunctive relief (Count VIII). Moreover, plaintiff seeks to represent a putative class of individuals. The issues raised in the 53-page Complaint are numerous and complex, and include an alleged criminal conspiracy to defraud plaintiff. These issues require a detailed response. In addition, Assurant and American Security contest the Court's subject-matter jurisdiction based on plaintiff's lack of constitutional standing. The additional pages requested will assist the Court in deciding the motion.

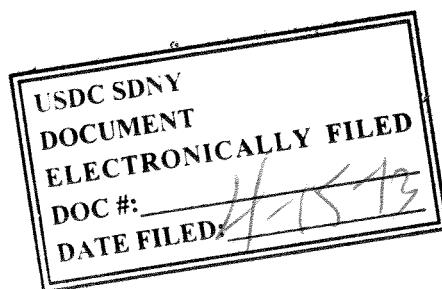
Plaintiff does not oppose this request.

Respectfully submitted,

/s/

Karen E. Abravanel

Direct Line: (212) 660-3069
kabravanel@sandw.com



The Honorable Vincent L. Briccetti
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April 12, 2013

cc: Jeanne F. D'Esposito (counsel for plaintiff, via email)
David Harrison (counsel for plaintiff, via email)